ELM GROVE TRAILER PARK (PWS #4010053) SOURCE WATER ASSESSMENT FINAL REPORT

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State of Idaho Department of Environmental Quality

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Executive Summary

Under the federal Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency (EPA) to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the act. The assessment for your particular system is based on a land use inventory of the designated source water area, sensitivity factors associated with each well, and characteristics of the aquifer that supplies your community with drinking water.

This report, Source Water Assessment for the Elm Grove Trailer Park, located in Meridian, Idaho, describes the public drinking water system, the boundaries of the zones of water contribution, and the associated potential contaminant sources located within those boundaries. This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. The results should <u>not be</u> used as an absolute measure of risk and they should <u>not be</u> used to undermine public confidence in the water system.

The Elm Grove Trailer Park (PWS #4010053) drinking water system consists of two wells. Well #1 is a flowing artesian well that serves as the primary drinking water source for the Elm Grove Trailer Park. Well #2 is a backup well that is only utilized approximately five days per year on particular days of peak demand.

Well #1 rated an overall moderate susceptibility to inorganic compounds (IOCs), volatile organic compounds (VOCs), synthetic organic compounds (SOCs), and microbial contaminants. These ratings are due, in large part, to the hydrologic characteristics of the area. Regional soil information indicates the presence of moderate to well-drained surface soils in the vicinity of the Elm Grove Trailer Park water system. These soils may offer less protection to the ground water, as they allow for a more rapid downward transport of pollutants in the unlikely event of a spill or release within the delineated drinking water capture zone. Also contributing to the overall moderate scores for Well #1 are the potential contaminant sources listed in Table 1A (page 22).

In addition, Well #1 resides within Idaho Department of Environmental Quality (DEQ) designated Group 1 Priority Areas for nitrates and the pesticides atrazine and alachlor. This tended to elevate the overall susceptibility scores.

Well #2 rated a high overall susceptibility for all four classes of contaminants. These elevated ratings can be credited to the presence of several potential contaminant sources within the delineated capture zone for Well #2 (Table 1B, page 22). In addition, the scores were increased due to the exclusion of valuable well construction and hydrologic information that could be found in an applicable well log. According to the system representative, the well was drilled in 1962 and is 57 feet deep, but DEQ could not locate a well log for Well #2. Because this information is lacking, the high susceptibility rankings are somewhat conservative.

There have been no serious water chemistry problems in the history of this system. No VOCs or SOCs have ever been discovered in the drinking water system. The IOCs nitrate and fluoride have been detected, but at levels below their respective maximum contaminant levels (MCLs) established by the EPA. Total coliform bacteria were detected in two samples collected from the distribution system in June of 1998. However, these positive results appear to be isolated events. Nitrate levels in both wells have remained relatively constant. Routine samples submitted for Well #1 have been consistently

higher than those in Well #2, averaging 2.29 milligrams per liter (mg/L) compared to 1.59 mg/L for Well #2, respectively. However, these samples have never approached the MCL for nitrate, which is 10.0 mg/L.

Although contaminant levels in the drinking water system have never exceeded current MCLs for any of the chemical pollutants regulated under the Safe Drinking Water Act, the Elm Grove Trailer Park should be aware that the potential for contamination still exists.

This assessment should be used as a basis for determining appropriate new protection measures or reevaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses that require surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

For the Elm Grove Trailer Park, drinking water protection activities should first focus on continued maintenance of the sanitary seals and distribution system. Actions should also be taken to keep a 50-foot radius circle clear around each wellhead. If the system should need to expand in the future, new well sites should be located in areas with as few potential sources of contamination as possible, and the site should be reserved and protected for this specific use. Any spills occurring on Fairview Avenue, the Union Pacific Railroad, or Interstate 84 should be monitored and dealt with expeditiously.

Because a portion of the ground water capture zone is outside the direct jurisdiction of the Elm Grove Trailer Park, the creation of partnerships with state and local agencies and industry groups are critical to the success of drinking water protection. Should microbial contamination become a problem, appropriate disinfection practices would need to be implemented to ensure the health of the Elm Grove Trailer Park residents.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. A strong public education program should be a primary focus of any drinking water protection plan, especially since the delineations contain some urban and residential land uses. Public education topics could include proper lawn care practices, household hazardous waste disposal methods, and the importance of water conservation to name but a few.

There are multiple resources available to help communities implement protection programs, including the Drinking Water Academy of the U.S. Environmental Protection Agency. In addition, because several major transportation corridors (Fairview Avenue, Union Pacific Railroad, Interstate 84) pass through the two delineations, the Idaho Department of Transportation should be involved in any protection measures. Drinking water protection practices dealing with agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the Ada County Soil Conservation District, and the Natural Resources Conservation Service.

A community should incorporate a variety of strategies in order to develop a comprehensive drinking water protection plan, be they regulatory in nature (i.e. zoning, permitting) or non-regulatory in nature (i.e. good housekeeping, public education, water conservation, specific best management practices). For assistance in developing protection strategies please contact the Boise Regional Office of the Idaho Department of Environmental Quality at 373-0550 or the Idaho Rural Water Association at 1-800-962-3257.

SOURCE WATER ASSESSMENT FOR THE ELM GROVE TRAILER PARK, MERIDIAN, IDAHO

Section 1. Introduction - Basis for Assessment

The following sections contain information necessary to understand how and why this assessment was conducted. It is important to review this information to understand what the ranking of this assessment means. A map showing the delineated source water assessment area and the inventory of significant potential sources of contamination identified within that area are contained in this report (Attachment A, pages 18-22). The list of significant potential contaminant source categories and their rankings used to develop the assessment is also attached.

Level of Accuracy and Purpose of the Assessment

The Idaho Department of Environmental Quality (DEQ) is required by the U.S. Environmental Protection Agency (EPA) to assess each drinking water source in Idaho for their relative susceptibility to contaminants regulated by the Safe Drinking Water Act Amendments of 1996. This assessment is based on a land use inventory of the delineated source water area, sensitivity factors associated with each well, and aquifer characteristics. Since there are over 2,900 public water sources in Idaho, there is limited time and resources available to accomplish the assessments. All of these assessments must be completed by May of 2003. An in-depth, site-specific investigation of each significant potential source of contamination is not possible. Therefore, this assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.

The ultimate goal of the assessment is to provide data to local communities to develop a protection strategy for their drinking water supply system. DEQ recognizes that pollution prevention activities generally require less time and money to implement than treatment of a public water supply system once it has been contaminated. DEQ encourages communities to balance resource protection with economic growth and development. The decision as to the amount and types of information necessary to develop a drinking water protection program should be determined by the local community based on its own needs and limitations. Drinking water protection is one facet of a comprehensive growth plan, and it can complement ongoing local planning efforts.

Section 2. Conducting the Assessment

General Description of the Source Water Quality

Elm Grove Trailer Park has a community public drinking water system serving approximately 60 people that is located in Ada County just south of Fairview Avenue in Meridian, Idaho (Figure 1, page 19). Residents receive their water from two wells. Well #1 is flowing artesian and serves as the primary source of drinking water for the Elm Grove Trailer Park. Well #2 is a backup well that is only utilized during periods of peak demand.

There have been no serious water chemistry problems in the history of this system. No VOCs or SOCs have ever been discovered in the drinking water system. The IOCs nitrate and fluoride have been detected, but at levels below their respective maximum contaminant levels (MCLs) established by the EPA. Total coliform bacteria were detected in two samples collected from the distribution system in June of 1998. However, these positive results appear to be isolated events. Nitrate levels in both wells have remained relatively constant. Routine samples submitted for Well #1 have been consistently higher than those in Well #2, averaging 2.29 milligrams per liter (mg/L) compared to 1.59 mg/L for Well #2, respectively. However, these samples have never approached the MCL for nitrate, which is 10.0 mg/L.

In June of 1998, total coliform bacteria were discovered in a routine sample collected from the distribution system. A repeat sample obtained five days later also tested positive for total coliform bacteria. The ensuing *E. coli* tests for both samples were negative. This detection of bacteria in a routine water sample was the first since December of 1988. Because the sample came from the distribution system, it is unknown whether the bacteria originated from contaminated ground water or due to a problem somewhere within the distribution system itself. Since the Elm Grove Trailer Park water system has remained free of bacteria since 1998, the positive tests appear to be an isolated incident, and not a cause for concern. Nevertheless, the presence of bacteria within the water system should be closely monitored. If it becomes a persistent problem, then disinfection practices should be investigated to protect the health of the Elm Grove community.

Defining the Zones of Contribution – Delineation

The delineation process establishes the physical area around a well that will become the focal point of the assessment. The process includes mapping the boundaries of the zone of contribution into time-of-travel (TOT) zones (regions indicating the number of years necessary for a particle of water to reach a pumping well) for water in the aquifer. DEQ contracted with BARR Engineering to perform the delineations using a combination of MODFLOW and a refined analytical element computer model approved by the EPA in determining the 3-year (Zone 1B), 6-year (Zone 2), and 10-year (Zone 3) TOT for water associated with the Boise Valley aquifer. The computer model used site specific data, assimilated by BARR Engineering from a variety of sources including a well log from the Elm Grove Trailer Park, other area well logs, the Treasure Valley Hydrologic Project, and hydrogeologic reports (detailed below in Section 3).

Identifying Potential Sources of Contamination

A potential source of contamination is defined as any facility or activity that stores, uses, or produces, as a product or by-product, the contaminants regulated under the Safe Drinking Water Act and has a sufficient likelihood of releasing such contaminants at levels that could pose a concern relative to drinking water sources. The goal of the inventory process is to locate and describe those facilities, land uses, and environmental conditions that are potential sources of ground water contamination. The locations of potential sources of contamination within the delineation areas were obtained by field surveys conducted by DEQ and from available databases.

It is important to understand that a release may never occur from a potential source of contamination provided best management practices are used at the facility. Many potential sources of contamination are regulated at the federal level, state level, or both to reduce the risk of release. Therefore, when a

business, facility, or property is identified as a potential contaminant source, this should not be interpreted to mean that this business, facility, or property is in violation of any local, state, or federal environmental law or regulation. What it does mean is that the <u>potential</u> for contamination exists due to the nature of the business, industry, or operation. There are a number of methods that water systems can use to work cooperatively with these possible contamination sources, including educational visits and inspections of stored materials. Many owners of such facilities may not even be aware that they are located near a public water supply well.

Contaminant Source Inventory Process

A two-phased contaminant inventory of the study area was conducted in October and November of 2001. The first phase involved identifying and documenting potential contaminant sources within the Elm Grove Trailer Park source water assessment area (Figures 2 & 3, pages 20-21) through the use of computer databases and Geographic Information System maps developed by DEQ. The second, or enhanced, phase of the contaminant inventory involved contacting the system representative, Loren Ross to validate the sources identified in phase one and to add any additional potential sources in the area.

For Well #1, the delineated source water area contains several potential sources of contamination. Within Zone 1B, the only site of concern is Locust Grove Road, which passes within approximately three-quarters of a mile from the wellhead. Because Locust Grove Road serves as an important transportation thoroughfare for the region, it was considered a potential source of contamination for all classes of pollutants.

In Zone II of Well #1, DEQ databases detected numerous sites that could potentially impact the aquifer. Of these sites, two are historical underground storage tanks (USTs) that were filled with petroleum. These tanks have subsequently been remediated and removed. However, the impact of any leaking petroleum from these sites is unknown. In addition, a mechanical contractor within this region is also regulated by the Resource Conservation Recovery Act (RCRA). These sites are regulated under RCRA to manage the generation, storage, and disposal of hazardous wastes. This approach is also known as the "cradle to grave" management. Finally, within Zone II is a Superfund Amendment and Reauthorization Act (SARA) Tier II Facility. This facility is a lawn and garden service. SARA sites store certain amounts of materials that are classified as hazardous according to certain criteria. These materials must be recognized under the Community Right to Know Act.

For Well #2, the delineated drinking water capture zone is simply a 500-foot radius circle, since pumping information for this well was unknown. Within this circular region, there is a gas station and an automobile lubrication/oil change center. Both of these sites were incorporated into the analysis as possible sources of IOC, VOC, and SOC pollutants. Furthermore, Fairview Avenue, which crosses just to the north of the Elm Grove Trailer Park, was included because it serves as another important transportation thoroughfare for the region.

All of the potential contaminant sources located within the delineated drinking water capture zone, along with the category of pollutants stored at each site can be found in Tables 1A & 1B on page 22 of this report.

Section 3. Hydrologic Conditions of the Treasure Valley

Treasure Valley Hydrologic Project Information (Petrich and Urban, 1996; Neely and Crockett, 1998; Petrich et al., 1999)

The "Treasure Valley" is a geopolitical region that includes the lower Boise River sub-basin. The lower Boise River sub-basin begins where the Boise River exits the mountains near the Lucky Peak Reservoir. From Lucky Peak Dam the lower Boise River flows about 64 (river) miles northwestward through the Treasure Valley to its confluence with the Snake River. The Treasure Valley Hydrologic Project area encompasses the lower Boise River area, and extends south to the Snake River. The southern area is included in the study area because of ground water flow from the Lower Boise River basin south toward the Snake River.

Significant amounts of desert area were converted to flood irrigated agriculture beginning in the 1860s. Irrigation led to increases in shallow ground water levels in some regions. These shallow ground water levels provided an inexpensive and readily obtainable source of water supply that is used extensively throughout the valley. Much of the population growth in the Treasure Valley has been occurring in previously flood-irrigated agricultural areas, resulting in increased pumpage and a reduction in local aquifer recharge. In addition, irrigation in some areas has become more efficient, reducing the amount of irrigation-related infiltration. Decreasing aquifer recharge and increasing pumpage is thought to be contributing to the decline of ground water levels in some areas.

The Treasure Valley experiences a temperate and arid-to-semiarid climate. Average high temperatures range from about 90°F in summer to 36°F in winter; low temperatures range from about 20°F in winter to about 56°F in summer. The average precipitation ranges from about 8 to 14 inches throughout most of the valley, most of which falls during the colder months in the form of snow in higher elevations and rain in the low-lying valleys.

Major surface water bodies include the Boise River, Lake Lowell, and Lucky Peak Reservoir. The primary source of surface water in the Treasure Valley is the high elevation area in the Boise River basin upstream of Lucky Peak Dam. Much of the spring runoff from the snow pack in high elevation areas is stored in three reservoirs: Anderson Ranch Reservoir, Arrowrock Reservoir, and Lucky Peak Reservoir.

Regional cropland is irrigated primarily with surface water through an extensive network of reservoirs and canals. The first canals were constructed in the 1860's; there are now over 1,100 miles of major and intermediate canals in the Treasure Valley, the majority of which are owned and maintained by canal companies and irrigation districts. Primary sources of irrigation water in the Treasure Valley include the Boise, Snake, and Payette Rivers.

Hydrogeology (from Petrich et al., 1999)

The lower Boise River sub-basin (Treasure Valley) is located within the northwest-trending topographic depression known as the western Snake River Plain. The western Snake River Plain is a relatively flat lowland separating Cretaceous granitic mountains of west-central Idaho from the granitic/volcanic Owyhee mountains in southwestern Idaho. The western Snake River Plain extends from about Twin Falls, Idaho northwestward to Vale, Oregon. The Snake River Plain is about 30 miles wide in the section containing the lower Boise River.

Historically, sediments originating from the surrounding mountains began accumulating on top of thick, basal basalts. Rifting and continued subsidence maintained the lowland topography, leading to the additional accumulation of water and sediments (Othberg, 1994). Basin infilling by sediments and basalt occurred from the late Miocene through the late Pliocene (Othberg, 1994). Incision caused by flowing water in major drainages (e.g., Snake and Boise Rivers) began in the late Pliocene or early Pleistocene, although deposition of coarse sediments continued during Quaternary glaciations (Othberg, 1994).

Several Quaternary basalt flows have been described in the western Snake River Plain, and have been assigned to the upper Snake River Group (Malde, 1991; Malde and Powers, 1962). Lava flowed across portions of the ancestral Snake River Valley (Malde, 1991) in an area that is now south of the Boise River. The Snake River then changed course, incising at its present location along the southern margin of the basalt flows. More recent eruptions (from Kuna Butte and other local sources) spilled lava into the canyon south of Melba. The Snake River has since incised this basalt (Malde, 1991).

The general stratigraphy of the western Snake River Plain consists of (from top to bottom) a thick layer of sedimentary deposits underlain by a thick series of basalt flows, which in turn are underlain by older, tuffaceous sediments and basalt (Malde, 1991; Clemens, 1993). The upper thick zone of sediments (up to approximately 6,000 feet thick) distinguishes the western Snake River Plain from the eastern Snake River Plain, in which the upper section is primarily Quaternary basalt (Wood and Anderson, 1981).

The uppermost sediments and basalt belong to the Pleistocene-age Snake River Group. The Snake River Group consists of terrace sediments, Quaternary alluvium, and Pleistocene basalt flows (Wood and Anderson, 1981). Snake River Group sediments and basalts cover much of the project area (Othberg and Stanford, 1992).

The Snake River Group overlies the Idaho Group sediments. The Idaho Group sediments can be divided into two general parts (Wood and Anderson, 1981). The lower Idaho Group contains sediments described as lake and stream deposits of buff white, brown, and gray sand, silt, clay, diatomite, numerous thin beds of vitric ash, and some basaltic tuffs. The upper part of the lower Idaho Group also contains some local, thin, basalt flows. The upper Idaho Group consists of sands, claystones, and siltstones, but differs from the lower Idaho Group in that it contains a greater percentage of coarser-grained materials. The upper Idaho Group sediments are associated with a fluvial/deltaic/lacustrine depositional environment; the lower Idaho Group sediments were deposited in more of a lacustrine/deltaic environment (Wood, 1994).

Wood (1994) identified a buried lacustrine delta within the Idaho Group sediments in the Nampa-Caldwell area. The location of the delta in the middle of the western Snake River Plain suggests that the eastern part of the Boise River basin was delta plain and flood plain at the time of deposition, while the western part was a deep lake environment. The delta probably prograded northwestward into a lake basin 830 feet deep, based upon high resolution seismic reflection data and resistivity log interpretations. The delta-plain and front sediments were shown to be mostly fine-grained, well-sorted sand with thin layers of mud (Wood, 1994). The northwest trend of the delta indicates a sediment source to the southeast, such as where the Snake River flows today (Wood, 1994).

A substantial, laterally extensive layer of clay is found at depths of 300 to 700 feet below ground

surface. The clay is important because it represents, in some areas, a significant aquitard separating shallow overlying aquifers from deeper zones. The clay, often described in well logs as having a blue or gray color, has been observed as far west as Parma, and as far east as Boise (although the clay is not found in the extreme eastern portions of the Treasure Valley). The clay varies from a few feet to a few hundred feet in thickness. Although significant layers of clay are present throughout the Idaho Group sediments, individual clay units are not necessarily continuous over large areas. Also, the top of the clay can vary in elevation by up to approximately 200 feet in some locations, such as in an area west of Lake Lowell. In general, sediments above the "blue clay" are coarser-grained than the interbedded sands, silts, and clays underlying the "blue clay."

The top of the upper Idaho Group is marked in several parts of the Treasure Valley by a widespread fluvial gravel deposit known as the Tenmile gravels. Tenmile gravels contain rounded granitic rocks and felsic porphyries originating from the Idaho Batholith to the north and northeast. The Tenmile gravels range up to 500 feet in thickness along the Tenmile Ridge south of Boise, but are less than 50 feet thick in the Nampa-Caldwell area (Wood and Anderson, 1981).

Aquifer Systems and Hydrogeologic Characteristics

Ground water for municipal, industrial, rural domestic, and irrigation uses in the Treasure Valley is drawn almost entirely from Snake River Group and Idaho Group aquifers. Many domestic wells draw water from shallow aquifers, such as those in the Snake River Group deposits. Larger production wells (for municipal and agricultural uses) draw water from the deeper Idaho Group sediments.

Aquifers contained in the Snake River and Idaho Group sediments comprise shallow and regional ground water flow systems. Shallow aquifers contained in Snake River Group sediments and basalts may belong to local flow systems. Most local flow system recharge stems from irrigation infiltration and channel (e.g., streams or canals) losses. Discharge from shallow, local flow systems often is to local drains or streams. The time from recharge to discharge in shallow flow systems (residence times) probably ranges from days to tens of years.

In contrast, regional ground water flow systems extend much deeper than local flow systems. The Treasure Valley regional flow system begins in the eastern part of the valley, as indicated by downward hydraulic gradients in the Boise Fan sediments (Squires et al., 1992). Some water also enters the regional flow system as underflow from the Boise Foothills in the northeastern part of the valley. The regional flow system is thought to discharge primarily to the Boise and Snake Rivers in the western and southwestern parts of the valley.

Aquifer material characteristics, material heterogeneity, and structural controls influence Treasure Valley ground water flow. Coarse-grained materials (e.g., sand and gravel) in upper zones are more capable of transmitting ground water than fine-grained sediments (e.g., silt and clay). Clay and silt in the Snake River sediments can restrict vertical and/or horizontal ground water movement. Perched aquifers are created when fine-grained lenses impede downward vertical flow. A distinctive clay layer, sometimes referred to as "blue clay," is present over large portions of the valley. The clay is absent in the easternmost portions of the lower Boise River Basin, but can reach a thickness of more than 200 feet toward the central and western portions of the basin.

Sequences of interbedded sand, silt, and clay, such as the Deer Flat Surface and the upper portion of the Glenns Ferry Formation of the upper Idaho Group in the Nampa-Caldwell area, are the major water-

producing aquifers in a large part of Canyon County (Anderson and Wood, 1981). The coarse-grained sediments in this zone produce water in excess of 2,000 gallons per minute (gpm).

The delineated source water assessment area for Well #1 of the Elm Grove Trailer Park can best be described as a southeastward trending corridor approximately three miles long and one-quarter mile wide (Figure 2, page 20). For Well #2, the delineated drinking water capture zone is simply a 500-foot radius circle (Figure 3, page 21). The fixed radius method was used to delineate the drinking water capture zone for Well #2 because no well pumping information was available. The actual data used by BARR Engineering in determining the source water zones of contribution are available from DEQ upon request.

Section 4. Susceptibility Analysis

Each well's susceptibility to contamination was ranked as high, moderate, or low risk according to the following considerations: hydrologic characteristics, physical integrity of the well, land use characteristics, and potentially significant contaminant sources. The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. Therefore, a high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for each well is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. Attachment B (pages 23-25) contains the susceptibility analysis worksheets. The following summaries describe the rationale for the susceptibility ranking.

Hydrologic Sensitivity

The hydrologic sensitivity of a well is dependent upon four factors: 1) the surface soil composition, 2) the material in the vadose zone (region between the land surface and the water table), 3) the depth to first ground water, and 4) the presence of a 50-foot thick impermeable zone above the production interval of the well. Slowly draining fine-grained soils such as silt and clay typically are more protective of ground water than coarse-grained soils such as sand and gravel. For the Elm Grove Trailer Park, regional soil information indicates the presence of moderate to well-draining soils in the vicinity. These soils generally provide less protection to the system because they allow for a more rapid downward movement of contaminants in the unlikely event of a spill or release within the source water assessment area.

The hydrologic sensitivity ranked high for both wells (Table 2, page 13). According to the well log for Well #1, the vadose zone is composed primarily of sand and gravel with some yellow clay layers. In addition, the depth to first ground water is approximately 28 feet, so contaminants would have to travel a relatively short distance to impact the aquifer. Furthermore, there was no evidence of an aquitard, or low permeability layer, that could help protect the ground water by retarding the downward movement of contaminants. Also, both wells lie within the 100-year flood plain for Five Mile Creek, which slightly increased the hydrologic sensitivity ratings.

A well log could not be located for Well #2. The lack of hydrologic information caused the score to increase slightly for this well.

Well Construction

Well construction directly affects the ability of the well to protect the aquifer from contaminants. System construction scores are reduced when information shows that potential contaminants will have a more difficult time reaching the intake of the well. Lower scores imply a system is less vulnerable to contamination. For example, if the well casing and annular seal both extend into a low permeability unit, then the possibility of contamination is reduced and the system construction score goes down. If the highest production interval is more than 100 feet below the water table, then the system is considered to have a better buffering capacity. In addition, if the wellhead and surface seal are maintained to standards, as outlined in sanitary surveys, then contamination down the well bore is less probable. Also, if the wellhead is protected from surface flooding and is outside the 100-year floodplain, then the likelihood of contamination from surface events is reduced.

In terms of the well construction score, Well #1 rated moderately susceptible to contamination. A well log was available for Well #1 and the information it included is summarized below in Table 3.

Table 3. Elm Grove Trailer Park Well Construction Summary Information

Well	Well Depth (ft)	Static Water Depth (ft)	Casing: diameter/ thickness (in)	Casing: Depth (ft)/ formation completed in	Surface seal: depth (ft)/ formation completed in	Screened Interval (ft)	Drill Year	Sanitary Survey Element s (A/B) ¹
Well	145	O	12 / 0.25	110 / yellow	102 / yellow	NONE	1966	Y/N
#1	(deepened	(artesian)		clay	clay		(deepened	
	on			-	-		in 1981)	
	6/26/81)						·	

¹ A = Well and surface seal in compliance; B = Protected from surface flooding NI = no information was available

According to the well log for Well #1, the annular seal extends to 102 feet below ground surface and terminates in a layer of yellow clay. For the purposes of the susceptibility analysis, this layer was considered to be relatively impermeable. Therefore, the annular seal should provide an adequate barrier to pollutants released near the well bore. As a result, the well construction score was slightly reduced.

The well log for Well #1 allowed a determination as to whether the well meets current public water system (PWS) construction standards. Although the well may have been in compliance with all regulations when it was completed, current PWS well construction standards are more stringent. The Idaho Department of Water Resources Well Construction Standards Rules (1993) require all PWSs to follow DEQ standards as well. IDAPA 58.01.08.550 requires that PWSs follow the Recommended Standards for Water Works (1997) during construction. Some of the regulations deal with screening requirements, aquifer pump tests, and thickness of casing. Table 1 of the Recommended Standards for Water Works (1997) lists the required steel casing thickness for various diameter wells. 12-inch and larger casing requires a casing thickness of at least 0.375-inches. Well #1 used 0.225-inch thick casing and therefore does not comply with the current construction standards.

For Well #2, a well log could not be located, and as a result, the well construction score was high (Table 2, page 12). This ranking is somewhat conservative, because the intricacies of the well are unknown. According to the system operator, Loren Ross, Well #2 is cased with 6-inch casing to a depth of 57 feet, but no other information could be obtained.

Potential Contaminant Source and Land Use

In terms of the potential contaminant source/land use score, Well #1 rated moderate for IOCs (i.e. nitrates, arsenic) and SOCs (i.e. pesticides) and low for VOCs (i.e. petroleum products) and microbial contaminants (i.e. bacteria). These ratings can be attributed, in large part, to the predominant land uses within the delineated drinking water capture zone, which are urban and commercial. These regions are considered by DEQ to be increasingly susceptible to ground water contamination due to improper household hazardous waste disposal, industrial pollution, and urban runoff, to name just a few. In addition, Well #1 lies within a DEQ designated Group 1 Priority Area for nitrates and the pesticides atrazine and alachlor. Because these compounds possess the ability to leach into the vadose zone, the water system may be subject to future contamination.

Well #2 ranked a potential contaminant source/land use score of low for IOCs and microbes, and moderate for VOCs and SOCs. For Well #2, the designated source water area is simply a 500-foot radius circle because well pumping information was not known. Within this circular region, the predominant land use is urban. In addition, there are several potential sources of contamination within this zone. These sites include a gas station and an automobile lubrication and oil change center, which is also regulated by SARA. Furthermore, Fairview Avenue passes directly through the delineated drinking water capture zone, so it was included as a possible source of pollutants.

The potential contaminant sources for both wells can be found in Tables 1A & 1B, along with the category of pollutants stored at each site (page 22).

Final Susceptibility Ranking

A detection above a drinking water standard MCL, any detection of a VOC or SOC, or a repeat detection of total coliform bacteria or fecal coliform bacteria at the wellhead will automatically give a high susceptibility rating to a well despite the land use of the area because a pathway for contamination already exists. Additionally, potential contaminant sources within 50 feet of a wellhead will lead to an automatically high susceptibility rating. Hydrologic sensitivity and system construction scores are heavily weighted in the final scores. Having multiple potential contaminant sources in the 0- to 3-year time of travel zone (Zone 1B) and the presence of agricultural land contribute greatly to the overall ranking.

For Well #1, the overall susceptibility rating was moderate for all contaminants. Overall, Well #2 ranked a high susceptibility for all classes of pollutants (Table 2, page 13).

Table 2. Summary of the Elm Grove Trailer Park Susceptibility Evaluation

							<u> </u>			
Susceptibility Scores ¹										
	Contaminant Inventory			System Construction	Final Susceptibility Ranking			y Ranking		
Well		IOC	VOC	SOC	Microbials		IOC	VOC	SOC	Microbials
Well #1	Н	M	L	М	L	M	M	M	M	M
Well #2	Н	L	M	M	L	Н	Н	Н	Н	Н

¹H = High Susceptibility, M = Moderate Susceptibility, L = Low Susceptibility,

IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Susceptibility Summary

For Well #1, a high hydrologic sensitivity and moderate system construction combined to give the well a moderate overall rating for all classes of contaminants. These ratings can be attributed, in large part, to hydrologic characteristics of the underlying aquifer. In addition, the system resides within DEQ designated Group 1 Priority Areas for nitrates and the pesticides atrazine and alachlor. This tended to elevate the overall scores, even though few potential contaminant sources exist in the 3-year TOT zone.

Well #2 rated a high overall susceptibility for all classes of contaminants. The elevated ratings can be credited to the presence of several potential contaminant sources within the delineated capture zone. In addition, the scores were increased due to the exclusion of valuable well construction and hydrologic information that can be found in well logs. According to the system representative, the well was drilled in 1962 and is 57 feet deep, but DEQ could not locate a well log for Well #2.

No VOCs or SOCs have ever been detected in the water system. Although there have been no significant water chemistry problems in the ground water, there have been detections of total coliform bacteria in routine water samples obtained from the distribution system in 1998.

Section 5. Options for Drinking Water Protection

The susceptibility assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what the susceptibility ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses that require surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

An effective source water protection program is tailored to the particular local source water protection area. A community with a fully developed drinking water protection program will incorporate many strategies. For the Elm Grove Trailer Park, drinking water protection activities should first focus on continued maintenance of the sanitary seals and distribution system. Actions should also be taken to keep a 50-foot radius circle clear around each wellhead. If the system should need to expand in the future, new well sites should be located in areas with as few potential sources of contamination as possible, and the site should be reserved and protected for this specific use. Any spills occurring on Fairview Avenue, the Union Pacific Railroad, or Interstate 84 should be monitored and dealt with

expeditiously.

Because a portion of the ground water capture zone is outside the direct jurisdiction of the Elm Grove Trailer Park, the creation of partnerships with state and local agencies and industry groups are critical to the success of drinking water protection. Should microbial contamination become a problem, appropriate disinfection practices would need to be implemented to ensure the health of the Elm Grove Trailer Park residents.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. A strong public education program should be a primary focus of any drinking water protection plan, especially since the delineation contains some urban and residential land uses. Public education topics could include proper lawn care practices, household hazardous waste disposal methods, and the importance of water conservation to name but a few.

There are multiple resources available to help communities implement protection programs, including the Drinking Water Academy of the U.S. Environmental Protection Agency. In addition, because several major transportation corridors (Fairview Avenue, Union Pacific Railroad, Interstate 84) pass through the delineation, the Idaho Department of Transportation should be involved in any protection measures. Drinking water protection practices dealing with agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the Ada County Soil Conservation District, and the Natural Resources Conservation Service.

A community must incorporate a variety of strategies in order to develop a comprehensive drinking water protection plan, be they regulatory in nature (i.e. zoning, permitting) or non-regulatory in nature (i.e. good housekeeping, public education, specific best management practices). For assistance in developing protection strategies please contact the Boise Regional Office of the Idaho Department of Environmental Quality or the Idaho Rural Water Association.

Assistance

Public water supplies and others may call the following DEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the DEQ office for preliminary review and comments.

Boise Regional DEQ Office (208) 373-0550

State DEQ Office (208) 373-0502

Website: http://www2.state.id.us/deq

Water suppliers serving fewer than 10,000 persons may contact John Bokor, Idaho Rural Water Association, at 1-800-962-3257 for assistance with wellhead protection strategies.

POTENTIAL CONTAMINANT INVENTORY LIST OF ACRONYMS AND DEFINITIONS

AST (Aboveground Storage Tanks) – Sites with aboveground storage tanks.

<u>Business Mailing List</u> – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

<u>CERCLIS</u> – This includes sites considered for listing under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). CERCLA, more commonly known as ASuperfund≅ is designed to clean up hazardous waste sites that are on the national priority list (NPL).

<u>Cyanide Site</u> – DEQ permitted and known historical sites/facilities using cyanide.

<u>Dairy</u> – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

<u>Deep Injection Well</u> – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

Enhanced Inventory – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (DEQ) during the primary contaminant inventory.

Floodplain - This is a coverage of the 100year floodplains.

<u>Group 1 Sites</u> – These are sites that show elevated levels of contaminants and are not within the priority one areas.

<u>Inorganic Priority Area</u> – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

Landfill – Areas of open and closed municipal and non-municipal landfills.

<u>LUST (Leaking Underground Storage Tank)</u> – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

<u>Mines and Quarries</u> – Mines and quarries permitted through the Idaho Department of Lands.)

Nitrate Priority Area – Area where greater than 25% of wells/springs show nitrate values above 5mg/l.

NPDES (National Pollutant Discharge Elimination System) – Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

<u>Organic Priority Areas</u> – These are any areas where greater than 25 % of wells/springs show levels greater than 1% of the primary standard or other health standards.

<u>Recharge Point</u> – This includes active, proposed, and possible recharge sites on the Snake River Plain.

RICRIS – Site regulated under <u>Resource Conservation</u> <u>Recovery Act (RCRA)</u>. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities) – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

Toxic Release Inventory (TRI) – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

<u>UST (Underground Storage Tank)</u> – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

<u>Wastewater Land Applications Sites</u> – These are areas where the land application of municipal or industrial wastewater is permitted by DEQ.

<u>Wellheads</u> – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

NOTE: Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

Where possible, a list of potential contaminant sites unable to be located with geocoding will be provided to water systems to determine if the potential contaminant sources are located within the source water assessment area.

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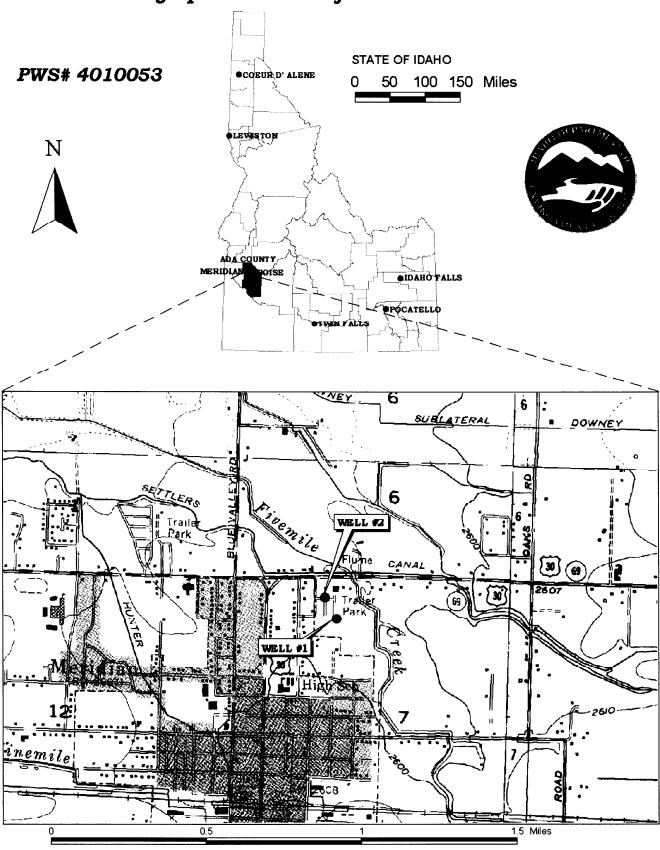
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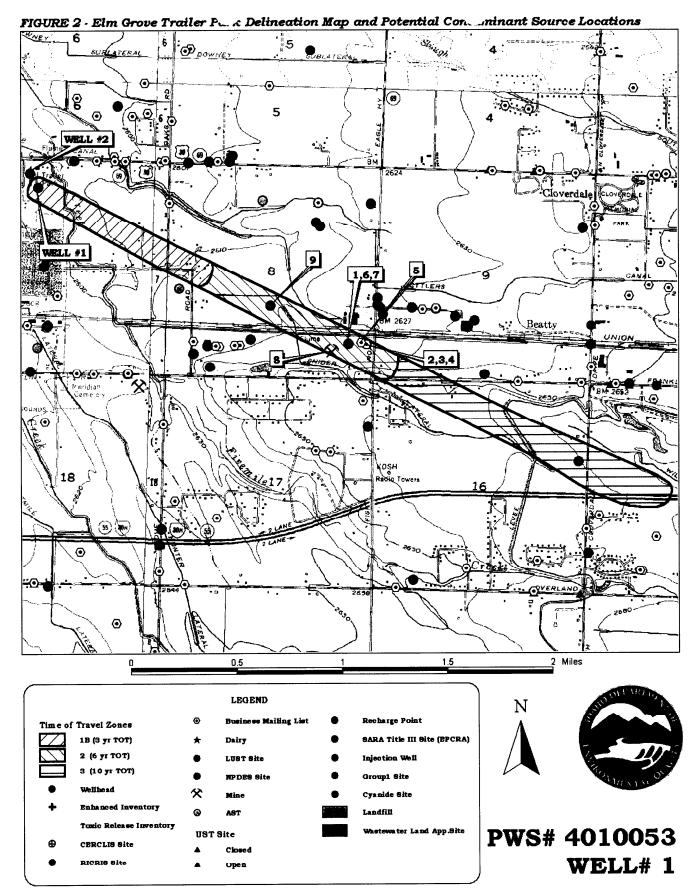
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Attachment A

Delineation Figures and Potential Contaminant Source Tables for Elm Grove Trailer Park

FIGURE 1: Geographic Location of the Elm Grove Trailer Park





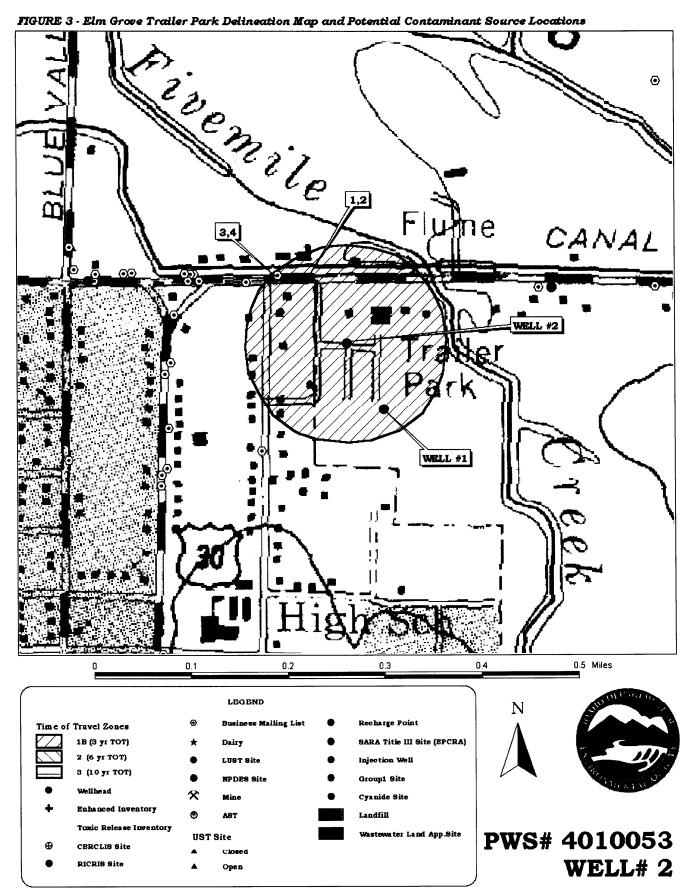


Table 1A. Elm Grove Trailer Park Potential Contaminant Inventory for Well #1

SITE#	Source Description ¹	TOT Zone ² (years)	Source of Information	Potential Contaminants ³		
	Locust Grove Road	0-3	GIS Map	IOC, VOC, SOC, Microbes		
	Union Pacific Railroad	3-6	GIS Map	IOC, VOC, SOC		
1,6,7	UST Site-Mechanical Contractor RCRIS Site	3-6	Database Search	VOC, SOC		
2	UST Site	3-6	Database Search	VOC, SOC		
3	Drilling Contractor	3-6	Business Mailing List	IOC, VOC, SOC		
4	Roofing Contractor	3-6	Business Mailing List	IOC, VOC, SOC		
5	General Contractor	3-6	Business Mailing List	IOC, VOC, SOC		
8	Gravel Pit Mine	3-6	Database Search	IOC, VOC, SOC		
9	SARA Site-Lawn & Garden Services	3-6	Database Search	IOC, VOC, SOC		
	Interstate 84	6-10	GIS Map	IOC, VOC, SOC		

¹ Find Source Description definitions on page 16

NOTE: The site number in this table corresponds to Figure 2, page 22.

Table 1B. Elm Grove Trailer Park Potential Contaminant Inventory for Well #2

SITE#	Source Description ¹	TOT Zone ² (years)	Source of Information	Potential Contaminants ³
	Fairview Avenue	0-3	GIS Map	IOC, VOC, SOC, Microbes
1,2	LUST/UST – Gas Station	0-3	Database Search	IOC, VOC, SOC
3,4	SARA Site – Automobile Lubrication/Oil Change Service	0-3	Database Search	IOC, VOC, SOC

¹ Find Source Description definitions on page 16

NOTE: The site number in this table corresponds to Figure 3, page 23.

² TOT = time-of-travel (in years) for a potential contaminant to reach the wellhead ³ IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

² TOT = time-of-travel (in years) for a potential contaminant to reach the wellhead

³ IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Attachment B

Elm Grove Trailer Park Susceptibility Analysis Worksheets

The final scores for the susceptibility analysis were determined using the following formulas:

- 1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.2)
- 2) 2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.375)

Final Susceptibility Scoring:

- 0 5 Low Susceptibility
- 6 12 Moderate Susceptibility
- ≥ 13 High Susceptibility

Ground Water Susceptibility Report Public Water System Name : ELM GROVE TRAILER PARK Well# : WELL #1 Public Water System Number 4010053 2/12/02 2:01:42 PM System Construction 4/30/66 Driller Log Available YES Sanitary Survey (if yes, indicate date of last survey) YES 1995 Well meets IDWR construction standards NO Wellhead and surface seal maintained YES Casing and annular seal extend to low permeability unit YES Highest production 100 feet below static water level NO Well located outside the 100 year flood plain NO Total System Construction Score 3 2. Hydrologic Sensitivity Soils are poorly to moderately drained Vadose zone composed of gravel, fractured rock or unknown YES 1 Depth to first water > 300 feet NO 1 Aquitard present with > 50 feet cumulative thickness NO Total Hydrologic Score TOC 3. Potential Contaminant / Land Use - ZONE 1A Land Use Zone 1A URBAN/COMMERCIAL 2 2 2 Farm chemical use high NO IOC, VOC, SOC, or Microbial sources in Zone 1A NO NO Total Potential Contaminant Source/Land Use Score - Zone 1A Potential Contaminant / Land Use - ZONE 1B Contaminant sources present (Number of Sources) 1 1 1 1 (Score = # Sources X 2) 8 Points Maximum Sources of Class II or III leacheable contaminants or 1 4 Points Maximum Zone 1B contains or intercepts a Group 1 Area YES 0 Less Than 25% Agricultural Land Land use Zone 1B 0 Total Potential Contaminant Source / Land Use Score - Zone 1B 5 Potential Contaminant / Land Use - ZONE II _____ Contaminant Sources Present YES Sources of Class II or III leacheable contaminants or YES 1 Less than 25% Agricultural Land Land Use Zone II Potential Contaminant Source / Land Use Score - Zone II Potential Contaminant / Land Use - ZONE III Contaminant Source Present 1 7 1 Sources of Class II or III leacheable contaminants or Is there irrigated agricultural lands that occupy > 50% of NO 0 O Total Potential Contaminant Source / Land Use Score - Zone III Cumulative Potential Contaminant / Land Use Score ______

5. Final Well Ranking

Moderate Moderate Moderate

round Water Susceptibility Report	Public Water System Numb	e : ELM GROVE TRAILER PARK per 4010053		WELL #2	2/12/02	1:54:28 I
System Construction			SCORE			
	Drill Date	6/26/62				
	Driller Log Available	NO				
Sanitary Survey (if yes, indicate		YES	1995			
	construction standards	NO	1			
	rface seal maintained	YES	0			
Casing and annular seal extend to		NO NO	2			
Highest production 100 feet bel		NO	1			
Well located outside the		NO	ī			
•••••		Total System Construction Score	5			
Hydrologic Sensitivity						
	to moderately drained	NO	2			
Vadose zone composed of gravel, frac		YES	1			
	irst water > 300 feet	NO	1			
Aquitard present with > 50 feet	cumulative thickness	NO	2			
		Total Hydrologic Score	6			
			IOC	VOC	soc	Microbia
Potential Contaminant / Land Use - ZO	NE 1A		Score	Score	Score	Score
	Land Use Zone 1A	URBAN/COMMERCIAL	2	2	2	2
	arm chemical use high	NO	0	0	0	
IOC, VOC, SOC, or Microbi	al sources in Zone 1A	NO	NO	NO	NO	NO
	Total Potential	Contaminant Source/Land Use Score - Zone 1A	2	2	2	2
Potential Contaminant / Land Use -	ZONE 1B					
Contaminant sources presen	it (Number of Sources)	YES	2	3	3	1
(Score = # Sources X 2) 8 Points Maximum		4	6	6	2
Sources of Class II or III leach	eable contaminants or	YES	1	2	1	
	4 Points Maximum	•	1	2	1	
Zone 1B contains or inte	rcepts a Group 1 Area	NO	0	0	0	0
	land use Zone 1B	Less Than 25% Agricultural Land	0	0	0	0
	Total Potential Co	ntaminant Source / Land Use Score - Zone 1B	5	8	7	2
Cumulative Potential Contaminant /	Land Use Score		7	10	9	4
Final Susceptibility Source Score			13	14	13	13
Final Well Ranking			High	 High	High	High